

Torres, Francine

From: todd@berginnut.com%inter2 [todd@berginnut.com] on behalf of todd@berginnut.com
Sent: Monday, August 15, 2005 11:00 AM
To: National List
Cc: cholmes@ota.com%inter2
Subject: Docket Number TM-04-07
Attachments: ATTACHMENT.TXT

Date: August 15, 2005

Arthur Neal, Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW., Room 4008
So. Ag Stop 0268
Washington, DC 20250

Via E-mail: National.List@usda.gov
Via Fax: (202) 205-7808

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Bergin Nut Company thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

Lecithin (unbleached), as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specific ingredients or food group(s)).” This substance is used as an alkalizing agent in Organic Dutch Process Cocoa Powder.

Bergin Nut Company currently uses organic chocolate to produce organic trail mixes. In order for these mixes to retain the Certified Organic designation (which is essential to our customers), we must continue to use organic chocolate rather than conventional. In addition, we are not aware of any organic chocolate manufacturer who does not use unbleached lecithin.

Sincerely,

Todd P. Henry

Todd P. Henry
Organic Buyer
Bergin Nut Company

8/15/2005